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11 Attorneys for Plaintiffs CMB
12 INFRASTRUCTURE INVESTMENT GROUP
IX, LP, CMB INFRASTRUCTURE
13 INVESTMENT GROUP XI, LP, and CMB
EXPORT, LLC

14 UNITED STATES DISTRICT COURT
15 DISTRICT OF NEVADA, SOUTHERN DIVISION
16

17 CMB INFRASTRUCTURE GROUP IX, LP, a
18 California limited partnership; CMB
INFRASTRUCTURE GROUP XI, LP, a
19 California limited partnership; CMB
EXPORT, LLC, a Texas limited liability
20 company,

21 Plaintiffs,

22 vs.

23 COBRA ENERGY INVESTMENT
FINANCE, INC., a Delaware corporation,
24 COBRA ENERGY INVESTMENT, LLC, a
Delaware corporation, COBRA INDUSTRIAL
25 SERVICES, INC., a Delaware corporation,
COBRA THERMOSOLAR PLANTS, INC, a
26 Nevada corporation, COBRA
INSTALACIONES Y SERVICIOS S.A., a
27 Spanish corporation, ACS SERVICIOS
COMUNICACIONES Y ENERGIA, S.L., a
28 Spanish corporation, BANCO SANTANDER,

Case No. 2:21-CV-00214-JAD-DJA

**STIPULATION AND ORDER
EXTENDING BRIEFING SCHEDULE ON
MOTIONS TO DISMISS**

[FIRST REQUEST]

ECF No. 54

1 S.A., a Spanish Corporation, TONOPAH
2 SOLAR ENERGY, LLC, a Delaware limited
3 liability company, and DOES 1 through 50,
4 inclusive,

5
6 Defendants.

7 Plaintiffs CMB Infrastructure Investment Group IX, LP, CMB Infrastructure Investment
8 Group XI, LP, and CMB Export, LLC (collectively, “Plaintiffs”), by and through their attorneys of
9 record, and Defendants ACS Servicios Comunicaciones y Energia, S.A. (“ACS”), and Banco
10 Santander, S.A. (“Santander,” with ACS, the “Moving Defendants”), by and through their respective
11 attorneys of record, hereby stipulate as follows:

12 Whereas, on February 9, 2021, Defendants Cobra Energy Investment Finance, LLC, Cobra
13 Energy Investment, LLC, Cobra Industrial Services, Inc., Cobra Thermosolar Plants, Inc., Cobra
14 Instalaciones y Servicios, S.A., ACS and Santander removed this action from the District Court of
15 the State of Nevada, Clark County (*see* ECF Doc. No. 1);

16 Whereas, on March 11, 2021, Plaintiffs filed a motion to remand this action to the District
17 Court of the State of Nevada, Clark County for lack of subject matter jurisdiction (*see* ECF Doc.
18 No. 17);

19 Whereas, on May 17, 2021, Defendant Santander filed a motion to dismiss for lack of
20 personal jurisdiction under Fed. R. Civ. P. 12(b)(2) and for failure to state a claim under Fed. R.
21 Civ. P. 12(b)(6) (*see* ECF Doc. No.52);

22 Whereas, also on May 17, 2021, Defendant ACS filed a motion to dismiss for lack of
23 personal jurisdiction under Fed. R. Civ. P. 12(b)(2) (*see* ECF Doc. No.53);

24 Whereas, to permit the parties ample time to fully and effectively brief the issues raised by
25 the pending Motions to Dismiss;

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NOW, THEREFORE, Plaintiffs and Moving Defendants stipulate that:

1. Plaintiffs' oppositions to the Motions to Dismiss shall be filed and served no later than June 16, 2021;

2. The Moving Defendants shall file and serve their replies to their respective Motions to Dismiss no later than June 30, 2021.

This is the Parties' first request for an extension of time on these motions, and is made before the expiration of any deadline to oppose the Motions to Dismiss by the Plaintiffs. This Stipulation is made in good faith and is not intended for purposes of delay.

DATED this 26th day of May, 2021

DATED this 26th day of May, 2021

LEWIS BRISBOIS BISGAARD & SMITH LLP

LEWIS ROCA ROTHGERBER CHRISTIE LLP

By: /s/ Adam J. Pernsteiner

By: /s/ J. Christopher Jorgensen

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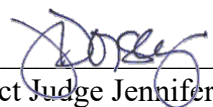
INFRASTRUCTURE INVESTMENT

Attorneys for Defendant Banco Santander, S.A.

GROUP XI, LP, and CMB EXPORT, LLC

ORDER

IT IS SO ORDERED.


U.S. District Judge Jennifer A. Dorsey

Dated: May 28, 2021